

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

RENEE LAMAR, as Personal Representative  
of the ESTATE OF PAULA MAXWELL, deceased,

Plaintiff,

Case No. 22-cv-10235  
Hon. Paul D. Borman  
Mag. Kimberly G. Altman

-v-

LINCARE, INC., and PHILIPS RS NORTH  
AMERICA, LLC, d/b/a Respironics, Inc., and  
JOHN DOE,

Defendants.

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**PLAINTIFF'S PRELIMINARY LAY WITNESS LIST**

NOW COMES Plaintiff, RENEE LAMAR, as Personal Representative of the ESTATE OF PAULA MAXWELL, deceased, by and through her attorneys, *FIEGER, FIEGER, KENNEY & HARRINGTON, PC*, and for her Preliminary Lay Witness List, identifies the following individuals/entities.

Plaintiff expressly notes that discovery is in its infancy, and specifically that she is still awaiting discovery responses and documents from Defendants. Plaintiff further notes that she has yet to receive initial disclosures from Defendant Philips. Therefore, Plaintiff expressly reserves her right to supplement this list as discovery continues.

For her Preliminary Lay Witness List, Plaintiff identifies:

1. Renee Lamar.
2. Regina Alexander.
3. Harry Lamar.
4. Kelvin Watts.
5. Kisimuel Watts.
6. Keith Alexander.
7. Lorenzo Lamar.
8. Jalen Alexander.
9. All family and friends familiar with Plaintiff's decedents injuries and the effects of their loss.

10. Any and all past and/or present employees, contract employees, support staff, representatives, records custodian and/or anyone affiliated in any way with the Defendant LINCARE, INC. with relevant knowledge and information including but not limited to:

- a. Robert Pummill;
- b. Christine Vincent;
- c. Padro Rodriguez;
- d. Donald Monroe;
- e. Scott Thompson;
- f. Roderick Boswell; and
- g. Ronald Wheeler.

11. Any and all past and/or present employees, contract employees, support staff, representatives and/or anyone affiliated in any way with the

Defendant PHILIPS RS NORTH AMERICA, LLC, d/b/a Respirationics, Inc., with relevant knowledge and information.

12. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Cardiovascular Clinical Associates - Farmington Hills with relevant knowledge and information including but not limited to:

- a. Dr. Mark Rasak; and
- b. Dr. Nenad Serafimovski.

13. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Michigan Medicine-UM Hospital with relevant knowledge and information including but not limited to:

- a. Dr. James Melvin;
- b. Dr. Taylor Kantor;
- c. Dr. Joseph Robitaille;
- d. Dr. Shagun Mathur;
- e. Dr. Daniel Meister;
- f. Dr. Brian Woodcock;
- g. Dr. Matthew Romano;
- h. Dr. Karen Kim;
- i. Dr. David Garcia;
- j. Dr. John Nicklas;
- k. Dr. Rodica Busui;

- l. Dr. Rishi Chanderraj;
- m. Dr. Jane Chargot;
- n. Dr. Danielle Staab;
- o. Dr. Andrew Kraftson;
- p. Dr. William Neumar;
- q. Dr. Ji Baang;
- r. Dr. Navid Seraji-Bozorgzad;
- s. Dr. Theresa Estiphan;
- t. Dr. Nazanene Esfandiari;
- u. Dr. Kelsey Peters;
- v. Dr. Zachary London;
- w. Dr. Rafael Wabl;
- x. Dr. Lisa Stropp;
- y. Dr. Kevin Kerber;
- z. Dr. Michael Lehmann;
- aa. Dr. Mohamed Sayyoub;
- bb. Dr. Mahani Ghadimi;
- cc. Dr. Nicholas Burris;
- dd. Dr. Ghurang Shah;
- ee. Dr. David Lin;
- ff. Dr. Amnah Aglan
- gg. Dr. Chloe Hill;
- hh. Dr. Michael Mazza;
- ii. Dr. Nicholas Beimer;
- jj. Dr. Dharshan Vummidi; and
- kk. Dr. Anum Aslam.

14. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Consultants in Sleep and Pulmonary Medicine, PLLC with relevant knowledge and information, including but not limited to:

- a. Dr. Mohammad Farra;
- b. Dr. Irina Shanidze;
- c. Dr. Andrew Easow;
- d. Tracy Beach, CMA;
- e. Chris Holwey, RRT; and
- f. Erica Dork, CMA.

15. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Providence Hospital with relevant knowledge and information including but not limited to:

- a. Dr. Waseem Farra; and
- b. Dr. Harvey Organanek.

16. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Kay Family Practice with relevant knowledge and information including but limited to:

- a. Dr. Deborah Kay.

17. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Beaumont Health System with relevant knowledge and information.

18. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Watermark Medical with relevant knowledge and information.

19. Any and all Employees, Representatives, Agents and Records Custodians of 911 dispatch with relevant knowledge and information for the City of Detroit.

20. Any and all Employees, Representatives, Agents and Records Custodians of O.H. Pye III Funeral Home with relevant knowledge and information including, but not limited to:

a. Kellee A. Miller.

21. Any and all Employees, Representatives, Agents and Records Custodians of Washtenaw County Medical Examiner Office with relevant knowledge and information including, but not limited to:

a. Dr. Allecia Wilson,

22. Any and all Employees, Representatives, Agents and Records Custodians of Medicare with relevant knowledge and information.

23. Any and all past and/or present employees, contract employees, staff, interns, volunteers, agents, officers, physicians, nurses, representatives, Records Custodians, and/or anyone affiliated in any way with Oakland Family

Practice with relevant knowledge and information including but not limited to:

a. Dr. Barry Bronstein.

24. Any and all past and/or present employees, contract employees, support staff, interns, volunteers, agents, EMTs, paramedics, representatives and/or anyone affiliated in any way with the Detroit Fire Department-EMS, with relevant knowledge and information.

25. Any and all Agents, Physicians, Nurses, Representatives, Employees and/or Records Custodians of the Henry Ford Health System with relevant knowledge and information including but not limited to:

- a. Dr. Mark Shievntz;
- b. Dr. Eric Cousineau;
- c. Dr. Trent Tennyson;
- d. Dr. Valdmir Staroevic;
- e. Dr. Gauravi Sabharwal;
- f. Dr. John Blase;
- g. Dr. Gina Fundaro;
- h. Dr. Emily Siegal;
- i. Dr. Robbin Thomas;
- j. Dr. Gail White;
- k. Dr. Varun Bhandarkar;
- l. Dr. Sabala Mandava;
- m. Dr. Nassar Beydoun;
- n. Dr. Gulpriya Gupta;
- o. Dr. Mark Shievitz;
- p. Dr. Eric Cousineau;
- q. Dr. Vladimir Starcevic;

- r. Dr. Gauravi Sabharwal; and
- s. Dr. Mark Krycia.

26. Plaintiff reserves the right to call any and all family and/or friends that are knowledgeable of the incident and/or have experienced the effects of Plaintiff decedent's injuries and the effects of their loss.

27. Expert witnesses to be identified consistent with the Court's Case Management Order.

28. Witnesses to be identified throughout discovery.

29. Any and all witnesses listed on Defendants' Witness/Expert Lists and/or Disclosures.

30. Any and all persons mentioned on pleadings, requests to admit, requests to produce, depositions, and/or interrogatories.

31. Any and all persons relevant to the incident in question who may become known through the course of discovery.

32. Any witnesses regardless of whether said witnesses are actually called at the time of trial or later withdrawn by such other parties.

33. Any party to the original lawsuit, or any amendments thereto, whether or not that party remains a party at the time of trial.

34. Any witness(es) that become known to Plaintiff following the filing of this witness list, to be promptly disclosed to counsel.



35. Any and all treating physicians, nurses, certified nurse assistants, and therapists of Plaintiff's decedent, including employees and custodians of records thereof and all treating physicians and care providers listed in the medical records that may be misstated, misspelled, and/or illegible.

36. Any and all individuals who may have witnessed the incident that is the subject of Plaintiff's Complaint or were present thereafter.

37. Any and all individuals who may be familiar with the machine/product that is the subject of Plaintiff's Complaint, and/or its history.

38. All treating physicians, nurses, certified nurse assistants, and therapists of Plaintiff's decedent, including employees and custodians of records thereof and all treating physicians and care providers listed may be called upon at trial to render fact and/or opinion testimony.

39. Any persons listed in the medical records of Plaintiff's decedent.

40. Any persons listed in any police report/investigation.

41. Any and all past medical providers and/or examining physicians of Plaintiff's decedent.

42. Plaintiff reserves the right to take De Bene Esse Depositions prior to the time of trial.

43. Plaintiff reserves the right to amend this Witness List upon continuing discovery and outstanding discovery owed by Defendants to this Plaintiff.

44. Plaintiff reserves the right to rebuttal witnesses, including but not limited to rebuttal expert witnesses, as may be necessary, and reserves the right to add additional witnesses, including but not limited to expert witnesses, that may become known or necessary through discovery.

Respectfully Submitted,

/s/ David A. Dworetsky

GEOFFREY N. FIEGER (P30441)

DAVID A. DWORETSKY (P67026)

*Fieger, Fieger, Kenney & Harrington, P.C.*

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Dated: July 1, 2022

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/David C. Savageau

David C. Savageau